DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-000 Oct 15 2 15 PM '97

RECEIVED

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE DESIGNATION OF WRITTEN CROSS-EXAMINATION TO UNITED STATES POSTAL SERVICE WITNESS: RALPH J. MODEN (USPS-T-4) (OCTOBER 15, 1997)

Pursuant to the Presiding Officer's Ruling No. R97-1/4, the Office of the Consumer Advocate hereby designates the following responses of USPS witness Moden as the written cross-examination of the OCA, to be included in the record of this proceeding.

- 1. ABP Interrogatories T4-1-2, 4, 6-10, 12-15, 16-19, 20, T26-6, 9(a),(c), 10(a),(b),13 redirected from witness Seckar;
- 2. ADVO Interrogatories T41-7-8 redirected from witness Takis;
- 3. APMU Interrogatories T33-9,33 redirected from witness Sharkey;
- DFC Interrogatories T4-1-5, 6-11, 12-17; 4.
- 5. DMA Interrogatories T4-1-11, 12(c)-(h),13, 14(a), 15-23(a), 23(c)-24(b), 24(f)-26, 28(b)-(f), 30(a)-(d), (f)-(l), 31,32,34,36,38, 39-42, 43-46, 48-49, 51-54, 55,56,60-62, 85(a),(c),(e),(f), 86-97, T14-1, 7(a)-(c), 23(c), 51, 60 redirected from witness Bradley;
- 6. FGFSA Interrogatories T4-1-5;
- NAA Interrogatories T4-1-5, 7-17; 18-22, 24-27, 7.
- NAPM Interrogatories T4-1-2; 8.

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- 9. NDMS Interrogatories T4-1-8, 10-15, 16, 17, 18, 19-21, T28-15-16, 20(a) redirected from witness Crum, T32-18,21,23 redirected from witness Fronk, T33-31 redirected from witness Sharkey,
- 10. NNA Interrogatories T4-1-6, T1-2 redirected from witness Pafford;
- 11. MH Interrogatories T4-1-4;
- 12. MMA Interrogatories T25-6, redirected from witness Hatfield, T36-37 redirected from witness Moeller;
- 13. MPA Interrogatories T4-3-13;
- 14. OCA Interrogatories T4-1, 2, 3-8(a) (b), 9, 10(a), (c, part), 11,12,13(a), 14-16(a), (b), (d), 17, 18,20(a), 24, 25-26, 27-28, T32-38-40,51, 56(c) redirected from witness Fronk;
- 15. TW Interrogatories T4-1-3(c), 3(e)-10, 11, 13-16, 12, 17, 21, 25, 26-28, 29-31, T26-3(f) redirected from witness Seckar;
- 16. UPS Interrogatories T4-1, 2-9, T14-44(a), 58 redirected from witness Bradley; and
- 17. POIR No. 3 Questions 29, 30.

Respectfully submitted,

KENNETH E. RICHARDSON

Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

KENNETH E. RICHARDSON

Attorney

Washington, D.C. 20268-0001

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October 15, 1997